

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

Cr. No. H-23-0556- S1

JOSE LUIS REYES-MARTINEZ

UNOPPOSED FIRST MOTION TO CONTINUE

Defendant, Jose Luis Reyes-Martinez, moves this Court for a 90-day continuance of all dates, and he respectfully shows as follows:

Mr. Reyes-Martinez is charged with illegal reentry, in violation of 8 U.S.C. § 1326. On February 9, 2024, Mr. Reyes-Martinez was arraigned on a superseding Indictment, and entered a plea of not guilty before Judge Christina A. Bryan, during which time Judge Bryan ordered that the Scheduling Order that was issued on November 22, 2023, remained in force. The pretrial conference is set for February 22, 2024, at 11:30 a.m., and the jury trial is set for February 26, 2024, at 1:00 p.m.

Counsel is awaiting additional discovery, and needs time to review and investigate. Undersigned counsel has identified certain legal and factual issues that require further investigation. Counsel needs more time to complete his investigation and analysis, and then to file pretrial motions, if necessary, and to prepare for trial, if necessary. Moreover, additional time is needed to discuss the case with Mr. Reyes-Martinez.

The defendant respectfully submits that the best interests of justice served by granting this motion for a continuance substantially outweigh the interests of the defendant and the community in a speedy trial, and that failure to grant the continuance would deprive defense counsel of sufficient time to prepare for trial.

The government is unopposed to this motion to continue.

Respectfully submitted,

MARJORIE A. MEYERS
Federal Public Defender
Southern District of Texas No. 3233
Texas State Bar No. 14003750

By /s/ Amr A. Ahmed
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CERTIFICATE OF CONFERENCE

I certify that I conferred with Assistant United States Attorney Lisa Collins and determined that the United States is unopposed to this first motion to continue.

By /s/ Amr A. Ahmed
AMR A. AHMED

CERTIFICATE OF SERVICE

I certify that on February 13, 2024, a copy of the foregoing was served by Notification of Electronic Filing and will be delivered by email to the office of Assistant United States Attorney Lisa Collins.

By /s/ Amr A. Ahmed
AMR A. AHMED